

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DESIGNATION FORM

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: Philadelphia, PA
 Address of Defendant: 1401 JFK Blvd., Suite 1530 Philadelphia, PA 19102
 Place of Accident, Incident or Transaction: Philadelphia

RELATED CASE, IF ANY:

Case Number: 23-cv-00427 Judge: Honorable Nitza I. Quinones Alejandro Date Terminated: Pending

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- | | | |
|--|---|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☒ is / ☐ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 1/26/2024  57026
 Attorney-at-Law / Pro Se Plaintiff Attorney I.D. # (if applicable)

CIVIL: (Place a ✓ in one category only)

A. Federal Question Cases:

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts
☐ 2. FELA
☐ 3. Jones Act-Personal Injury
☐ 4. Antitrust
☐ 5. Patent
☐ 6. Labor-Management Relations
☒ 7. Civil Rights
☐ 8. Habeas Corpus
☐ 9. Securities Act(s) Cases
☐ 10. Social Security Review Cases
☐ 11. All other Federal Question Cases
 (Please specify): _____

B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts
☐ 2. Airplane Personal Injury
☐ 3. Assault, Defamation
☐ 4. Marine Personal Injury
☐ 5. Motor Vehicle Personal Injury
☐ 6. Other Personal Injury (Please specify): _____
☐ 7. Products Liability
☐ 8. Products Liability – Asbestos
☐ 9. All other Diversity Cases
 (Please specify): _____

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration.)

I, Olugbenga O. Abiona, Esquire, counsel of record or pro se plaintiff, do hereby certify:

- ☒ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:
☐ Relief other than monetary damages is sought.

DATE: 1/26/2024  57026
 Attorney-at-Law / Pro Se Plaintiff Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Lauren Yvette Tucker

(b) County of Residence of First Listed Plaintiff Philadelphia
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Olugbenga O. Abiona, Esquire, 215-833-8227
P.O. Box 3326, Cherry Hill, NJ 08034

DEFENDANTS

City of Philadelphia and Rakeisha Steveson

County of Residence of First Listed Defendant Philadelphia
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

| CONTRACT | TORTS | FORFEITURE/PENALTY | BANKRUPTCY | OTHER STATUTES | |
|---|--|--|---|--|---|
| <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise | PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice | PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions | <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes |
| REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property | CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education | PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement | | | |

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
Title VII, ADEA, and Section 1983 of the Civil Rights Act

Brief description of cause:
Retaliatory actions as a result of Plaintiff engaging in protected activities.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE Honorable Nitza I. Quinones AlejandroDOCKET NUMBER 23-cv-00427

DATE

01/26/2024

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|---|--|------------------|
| ----- LAUREN YVETTE TUCKER Plaintiff, vs. CITY OF PHILADELPHIA and RAKEISHA STEVESON Defendants | : : : : : : : : : : | CIVIL ACTION No. |
|---|--|------------------|

COMPLAINT AND JURY DEMAND

INTRODUCTION

1. Plaintiff, Lauren Yvette Tucker, in the above captioned matter, claims a sum in excess of One Hundred Thousand Dollars (\$100,000.00) in damages and upon her causes of action, avers as follows:
2. This action for monetary damages and other appropriate relief is brought by Plaintiff to redress violations by Defendant, City of Philadelphia (hereinafter "City"), of rights secured to Plaintiff by the laws of the United States of America.
3. This action arises under the Civil Rights Act 42 U.S.C. 2000e et seq, (Title VII), and the Age Discrimination in Employment Act, which prohibit retaliation by employers against employees who engage in protected activities under these statutes and is brought by Plaintiff to improper, unlawful, willful, and deliberate retaliatory actions by Defendant in violation of these statutes.
4. This action also arises under the Civil Rights Act 42 USC §1981, which is asserted against the individual defendant Rakeisha Steveson, in her individual capacity only, and through

Civil Rights Act 42 USC §1983, because she was acting under color of state law when she engaged in these unlawful conducts.

II. JURISDICTION AND VENUE

5. The jurisdiction of this Court is invoked pursuant to Title 28 U.S.C. §1331, which provide for the original jurisdiction of Plaintiff's claims arising under the laws of the United States of America.

6. Plaintiff exhausted her administrative remedies for retaliation claims against the City under Title VII and ADEA before bringing these claims to Court. On December 7, 2023, Plaintiff received her right to sue letter from the EEOC to take her retaliation claims to court. See attached Exhibit A. The venue of this Court is proper pursuant to the dictates of Title 28 U.S.C. §1391 (c).

III. PARTIES

7. Plaintiff, Lauren Yvette Tucker, is a citizen of the United States and the Commonwealth of Pennsylvania, who currently resides in Philadelphia, Pennsylvania.

8. Defendant, City of Philadelphia ("City"), is a municipality in the Commonwealth of Pennsylvania, with its offices located at Municipal Services Building, 1401 JFK Blvd., Suite 1530, Philadelphia, PA 19102.

9. Defendant Rakeisha Stevenson is an individual, who currently resides in the City of Philadelphia, Pennsylvania, and at all times relevant to this action was Plaintiff's supervisor and was acting under color of state law.

IV. BRIEF STATEMENT OF FACTS

10. Plaintiff is a black, African American female and is 56 years old.

11. Plaintiff has been employed with the City's Office of Homeless Services since June 12, 2006.

12. On or about February 14, 2022, a job posting for the position of Director of Food Services was sent by the City to all staff members.

13. On February 22, 2022, Plaintiff submitted an application and her resume for the Director of Food Services position.

14. On or about March 14, 2022, Plaintiff spoke with Dave Holloman, and he informed Plaintiff that she "did not make the cut" and would not be getting the Director position.

15. On or about March 15, 2022, Plaintiff discovered an online announcement by Temple University that was posted **on January 27, 2022**, congratulating Amara O'Connell on being promoted to the position of Director of Food Services for OHS.

16. In or about March 2022, Plaintiff filed an internal complaint of race and age motivated failure to promote her with the City's Human Resources.

17. On or about April 28, 2022, Plaintiff filed an EEOC Charge of race and age discrimination against the City.

18. On February 2, 2023, Plaintiff filed a civil action against the City with this Court.

19. Ever since Plaintiff engaged in the above protected activities under the applicable statutes, Plaintiff has been subjected to retaliatory actions by the City.

20. On or about December 24, 2022, Plaintiff severely dislocated and broke her ankle in two

21. On December 30, 2022, while Plaintiff was out on FMLA an email from Ms. Robinson to Ms. Steveson was sent regarding rejected APRs and APRs that were coming due. These APRs should have been handled by someone in the office in Plaintiff's absence.

22. On January 9, 2023, Plaintiff had surgery that included having a steel plate inserted on the right side of her ankle and rods that go through the bone on the other side.

23. Plaintiff returned to work from FMLA and worked remotely starting on February 15, 2023.

24. When Plaintiff returned to work on February 15, 2023, she received no meeting with her supervisor to discuss what was due or what had been done in Plaintiff's absence; no welcome back, no nothing.

25. So, Plaintiff worked on addressing emails and getting caught up with other administrative responsibilities. But Plaintiff was faced with animosities and antagonistic conduct from her supervisors, which she never had before she engaged in the above stated protected activities under the Civil Rights Act.

26. Plaintiff was subjected to severe retaliatory harassment by her supervisors, Rakeisha Stevenson, Daiquiri Robinson, Director of Long-Term Housing and Roberta Cancelier, Deputy Director, which included unjustifiable demands where Plaintiff was assigned additional job duties of analysts that left the department, unattainable deadlines, threats of disciplinary actions, and verbal threats of job stability.

27. On February 28, 2023, Plaintiff's daughter had emergency surgery to remove her daughter that had died in her womb. Plaintiff had taken a couple of days off to support her daughter who had lost a baby. Plaintiff's supervisor, Ms. Stevenson was informed about these events.

28. But, while Plaintiff was out on leave to support her daughter who had lost a baby, Ms. Steveson called Plaintiff to tell Plaintiff that Plaintiff had missed the deadline to submit an APR and Plaintiff was in trouble and she told Plaintiff, "Roberta wants you written up because she is

tired of APR's being late". This was also a harassment of the Plaintiff while she was out on leave, supporting her daughter who lost a baby, and Plaintiff should not be receiving this type of communication from her supervisor while off duty.

29. Yet, there were employees who had not submitted their APR report for months but were not threatened with being written up.

30. On March 1, 2023, Plaintiff contacted Angela Foreman for assistance on Plaintiff's APR that was late, and Ms. Foreman stated, "APRs are late all the time, and nothing is done. If they write you up fight it".

31. In April 2023, two analysts, Christina and Natasha left OHS.

32. LaShan and Plaintiff were the only two analysts left. Plaintiff and LaShan were told by Ms. Steveson that the analysts' caseloads were now their responsibilities, and it would remain so until the City hires the replacement analysts for these vacant positions.

33. For over seven months thereafter, Plaintiff and LaShan were held responsible for the job duties of these two vacant Analyst positions and Defendant has yet to hire replacement analyst but overloading Plaintiff with overwhelming additional job duties.

34. In or about May 2023, Plaintiff had to do a complaint line and she checked in to the line on time, however, a supervisor, Towana Conway, started harassing Plaintiff that she did not check in to the line, which was false.

35. Also, in or about June 2023, when Plaintiff was out for the funeral of a friend on approved leave, Plaintiff was called by Ms. Stevenson while Plaintiff was in the funeral home, about not answering the comment line that day and she threatened Plaintiff with a write up. Yet, Ms. Steveson knew Plaintiff was out on approved leave.

36. Ms. Steveson also told Plaintiff that Plaintiff's position must be justified and threatened Plaintiff that her employment will be terminated.

37. Plaintiff was subjected to retaliatory treatment and given an unmanageable workload, unclear communication from her managers, lack of manager support and unreasonable timeframes for her job duties by Defendants.

38. In or about July 2023, because of the persistent retaliatory harassment, Plaintiff went on leave due to stress. Upon returning from leave, Plaintiff had a one-on-one meeting with Ms. Stevenson, where she wrote Plaintiff up based on false allegations, and Ms. Steveson sent this write up to Defendant's Human Resources and threatened Plaintiff with discipline.

39. From in or about August 2023, Ms. Steveson continued to subject Plaintiff to retaliatory excessive monitoring, asking Plaintiff to submit a daily log of what Plaintiff did on an hourly basis, but no one else in the department had to do that. Plaintiff was told by Ms. Steveson that she needed to account for each day by completing a daily log email.

40. In or about August 11, 2023, Plaintiff requested administrative leave from Defendant, but was denied.

41. Ms. Steveson was aware of Plaintiff's internal complaint of race and age discrimination with the City's Human Resources in March 2022, and Plaintiff's EEOC complaint filed in April 2022, because she discussed them with Plaintiff.

42. Plaintiff was out of work on approved leave of absence as a result of the retaliatory harassment and retaliatory actions by Defendants for stress and depression since on or about October 2023, until she was constructively terminated on her employment on January 25, 2024. Plaintiff resigned her employment with the City on January 25, 2024, because of the retaliatory

harassment and hostile work environment by Defendants which was affecting and was detrimental to her health. See Exhibit B attached and incorporated by reference hereto.

V. STATEMENT OF CLAIM

COUNT ONE – Title VII VIOLATIONS –RETALIATION

Plaintiff v. City of Philadelphia only

43. Plaintiff incorporates by reference all allegations alleged in paragraphs 1 through 42 as if the same were fully set forth at length herein.
44. The acts and conducts of Defendant City of Philadelphia through its respective agents, officers, employees, and officials as stated above where Plaintiff was subjected retaliatory actions, retaliatory harassment and constructive termination of her employment were violations of Title VII of the Civil Rights Act, 42 U.S.C. §2000e et seq.
45. As a direct result of the said retaliatory practices of the Defendant in violation of Title VII, Plaintiff has sustained loss of wages and earnings, loss of benefits, loss of future earning power, loss of back pay, front pay, interest due therein as well as mental anguish, emotional distress, humiliation, and damage to reputation.

COUNT TWO –ADEA VIOLATIONS-RETALIATION

Plaintiff v. City of Philadelphia only

46. Plaintiff incorporates by reference all allegations alleged in paragraphs one 1 through 45 as if same were fully set forth at length herein.
47. The acts and conducts of the Defendant City of Philadelphia, through its agents, officers, and employees as stated above where Plaintiff was subjected retaliatory actions, retaliatory harassment and constructive termination were violations of the Age

Discrimination in Employment Act.

48. As a direct result of said retaliatory practices of the Defendant, Plaintiff has sustained loss of wages and earnings, loss of benefits, loss of future earning power, loss of back pay, front pay, interest due therein as well as mental anguish, emotional distress, humiliation, and damages to reputation.

COUNT THREE- 42 U.S.C. §1981 VIOLATION AS ENFORCEABLE BY WAY OF §1983
Plaintiff v. City of Philadelphia

49. Plaintiff repeats and incorporates by reference the allegations in paragraphs 1 through 48 above as though fully set forth herein.
50. The acts and conduct of the City of Philadelphia as stated above where Plaintiff was subjected to numerous adverse actions, including retaliatory harassment and hostile work environment, retaliatory disciplines, and retaliatory constructive termination by the City of Philadelphia, through its officers, managers, and supervisory officials after Plaintiff complained and or opposing race discrimination by the City's officials were violations of the Civil Rights Act, 42 U.S.C. §1981.
51. As a direct and proximate result of the said retaliatory practices of the City of Philadelphia, Plaintiff has sustained loss of wages and earnings, loss of benefits, loss of future earning power, loss of back pay, front pay, interest due therein as well as mental anguish, emotional distress, humiliation, and damages to reputation.

COUNT FOUR –Section 1981 VIOLATIONS-Retaliation
Plaintiff v. Defendant Steveson

52. Plaintiff incorporates by reference all allegations alleged in paragraphs one 1 through 51 as if same were fully set forth at length herein.
53. The acts and conducts of the Defendant Steveson as stated above where Plaintiff was

subjected to retaliatory actions, retaliatory harassment and hostile work environment, and retaliatory constructive termination of her employment because she engaged in protected activities were violations of the Civil Rights Act 42 USC §1981.

54. Plaintiff is asserting her Section 1981 claims against this individual defendant via Section 1983 of the Civil Rights Act, as Defendants Steveson was acting under color of state law when she engaged in this violation of Plaintiff's civil rights.
55. As a direct result of said retaliatory actions of Defendant Steveson, Plaintiff has sustained loss of wages and earnings, loss of benefits, loss of future earning power, loss of back pay, front pay, interest due therein as well as mental anguish, emotional distress, humiliation, and damages to reputation.

COUNT FOUR – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Plaintiff v. Defendant Steveson

56. Plaintiff incorporates by reference all allegations alleged in paragraphs 1 through 52 as if same were fully set forth at length herein.
57. The acts and conducts of Defendant Steveson as stated above were outrageous and with the intent to cause Plaintiff severe emotional distress.
58. Defendant's conduct was intentional or reckless disregard of the harm to Plaintiff, which was so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, to be regarded as atrocious, and utterly intolerable in a civilized society.
59. As a direct and proximate result of the conducts of Defendant Steveson, Plaintiff has sustained severe mental anguish, emotional distress, and humiliation.

VI. PRAYER FOR RELIEF

Wherefore, Plaintiff respectfully demands judgment against Defendants, and request that this Honorable Court:

A. Enter judgment against the Defendants for back pay, front pay, loss income, loss benefits, pre and post judgment interests, costs of suit, compensatory damages, punitive damages against Defendant Steveson, attorneys' fees and expert witness fees as permitted by law; and

B. Award such other relief as the Court may deem necessary and just, including but not limited to an Order to make whole.

C. Declaring that the acts and practices complained of herein violate Title VII of the Civil Rights Act protection against retaliation for protected activities based on race.

D. Declaring that the acts and practices complained of herein violate Age Discrimination in Employment Act protection against retaliation for protected activities based on age.

E. Declaring that the acts and practices complained of herein violate Title VII of the Civil Rights Act protection against retaliation for protected activities based on race.

F. Enjoining and restraining the acts and practices complained of herein.

JURY TRIAL DEMAND

Plaintiff demands a jury trial on all questions of fact raised by this complaint.

ABIONA LAW PLLC



Olugbenga O. Abiona, Esquire
Attorney ID # 57026
P.O. Box 3326
Cherry Hill, NJ 08034
(215) 833-8227
Attorney for Plaintiff

Dated: January 26, 2024



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Philadelphia District Office
801 Market St, Suite 1000
Philadelphia, PA 19107
(267) 589-9700
Website: www.eeoc.gov

DISMISSAL AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161, 161-A & 161-B)

Issued On: 12/07/2023

To: Lauren Y. Tucker
4442 N. 16th Street
Philadelphia, PA 19140

Charge No: 530-2024-01605

EEOC Representative and Phone: Legal
Legal Unit
(267) 589-9707



DISMISSAL OF CHARGE

The EEOC has granted your request that the agency issue a Notice of Right to Sue, where it is unlikely that EEOC will be able to complete its investigation within 180 days from the date the charge was filed.

The EEOC is terminating its processing of this charge.

NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission,

Digitally Signed By: Karen McDonough
12/07/2023

Karen McDonough
Deputy District Director

Cc:

Lashawn Hand
City Of Philadelphia
1515 Arch St Suite 15
PHILA, PA 19102

Rakeisha Stevenson
1401 JFK Boulevard 10th Floor
Philadelphia, PA 19102

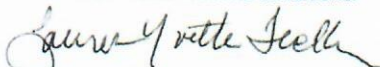
Olugbenga O Abiona
ABIONA LAW PLLC
121 South Broad Street Suite 1200
Philadelphia, PA 19107

Please retain this notice for your records.

January 25th, 2024

To whom it may concern:

Effective today, January 25th, 2024, I, Lauren Yvette Tucker am resigning from my civil service position as Social Service Program Analyst with OHS and the City of Philadelphia. I am resigning due to the ongoing harsh, retaliatory, micromanaging, threatening and harassing treatment I have experienced from OHS management, which began in February of 2023. Upon having to take a leave of absence in October 2023 due to toxic and hostile working conditions, for my physical as well as mental health, I can no longer work under these extreme conditions.


Lauren Yvette Tucker

